

To whom it may concern,

I am writing in opposition to the FAA NPR titled " National Air Tour Safety Standards". I have seen no evidence that the restrictions imposed on operators by this proposed regulation would have any material effect on safety, which is the rule's stated intention. I am a commissioner for the Katama Airport (1B2), the oldest continuously operating grass strip airfield in the country. I am also a former Naval Aviator, and an instrument rated commercial pilot in both fixed and rotary wing aircraft. This ill thought out regulation would put an end to the biplane and glider rides that are the significant tourist attraction of our airport. No provision of this rule would have even the slightest possible safety impact on these operations, but would put two business and their employees out of business forever. Our community relies on the tourist trade, and people come to our airport to experience the thrill of flying a vintage Waco from a traditional grass strip. There has NEVER been any type of safety issue with this operation, but if there were any way to make this practice safer, I would endorse it wholeheartedly. But after reviewing the NPR as it stands, I fail to see how forcing small operator to comply with Part 135 would impact safety in the slightest.

An alternative regulation that might warrant consideration would be to require sightseeing aircraft to be equipped with a transponder and a portable TCAS system. After all, I assume the intent of this alleged safety regulation is to prevent mid-air collisions, and one can now equip an aircraft with a traffic alert and collision avoidance system for about \$1,000. That would minimize the already minimal possibility of mid-air without forcing operators with perfect safety records out of business.

I thank you for your attention to this matter.

James S. Craig